

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

Docket No. 2019-297-G

IN RE:

James B. Hamlett,  
Complainant/Petitioner,

V.

Piedmont Natural Gas Company, Inc.  
Defendant/Respondent.

OPPOSITION TO RESPONSE TO  
OPPOSITION TO MOTION FOR  
ADMISSION *PRO HAC VICE*

I oppose the Respondent's Response to my Opposition to the Respondent's Motion for Admission *Pro Hac Vice* and respectfully request that the Public Service Commission deny the Motion. On pp.2-3 of Ms. McGrath's Verified Application for Admission in the State of South Carolina *Pro Hac Vice*, she lists three matters in which she is providing legal services *pro hac vice* before the Commission. The status of these matters is listed in her application as "Proceeding remains open." The Respondent is now claiming that the matters are, in fact, closed and have been for some time, despite what Ms. McGrath's application states. It appears that a substantial error was made in Ms. McGrath's application that the application needs to be corrected and refiled to be accepted as a valid application for purposes of complying with Rule 404(a) SCACR. The Respondent's Response also references Rule 404(d) and Commission website updates, neither of which I referenced in my Opposition. I solely referenced information contained in Ms. McGrath's application.

Either Ms. McGrath is currently providing legal services for three matters before the commission, or her Application for Admission in the State of South Carolina *Pro Hac Vice* contains substantial errors and needs to be refiled to be accepted as a valid application for compliance with Rule 404(a). In either case, Ms. McGrath is not eligible to be admitted *pro hac vice* for the Respondent. I respectfully request that the Commission deny the Respondent's Motion.

Respectfully submitted this 5<sup>th</sup> day of November.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached is being served this date upon all of the parties to this docket via electronic mail.

This the 5th day of November, 2019.

/s/ James Hamlett  
James Hamlett